

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

)
) No. 03 MDL 1570 (GBD/FM)
) ECF Case
)

This document relates to:

BURNETT, *et al.* v. AL BARAKA INVESTMENT & DEVELOPMENT CORP., *et al.*,
Case No. 03-CV-5738.

**DEFENDANT PEROUZ SEDAGHATY'S
ANSWER TO THIRD AMENDED COMPLAINT**

Defendant Perouz Sedaghaty ("Sedaghaty"), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits his Answer to Plaintiffs' Third Amended Complaint ("Complaint").

Introduction

Pages 199-220 of the Complaint set forth general allegations as to the nature of this case to which no response is required. To the extent that a response is required, Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in the Introduction, other than to deny that there is any basis for this action against Sedaghaty or that plaintiffs are entitled to any relief against Sedaghaty.

Jurisdiction and Venue

1. Sedaghaty denies that this court has subject matter jurisdiction over Sedaghaty under 28 U.S.C. §§ 1331 and 1367, 18 U.S.C. § 1350 (Alien Tort Claims Act), and 18 U.S.C. §§ 2334 and 2338 (Anti-Terrorism Act). Sedaghaty denies that jurisdiction over plaintiffs' claims against him is proper under 28 U.S.C. §§ 1330(a), 1332(a)(2), and 1605, because those provisions apply solely to actions against foreign states.

2. Sedaghaty denies that jurisdiction over plaintiffs' claims against Sedaghaty is proper under 28 U.S.C. §§ 1605(a)(5) and 1605(a)(7), because those provisions apply solely to actions against foreign states.

3. Sedaghaty denies that venue is proper under "28" [sic, 18] U.S.C. § 2334 (Anti-Terrorism Act). Sedaghaty denies that venue is proper under 28 U.S.C. §§ 1391(d) and 1391(f)(4), because those provisions apply solely to actions against foreign states.

Parties — Plaintiffs

4. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

Factual Allegations Against Defendants

5. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

6. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

7. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

8. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

9. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

10. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

11. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

12. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

13. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

14. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

15. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

16. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

17. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

18. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

19. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

20. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

21. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

22. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

23. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

24. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

25. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

26. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

27. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

28. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

29. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

30. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

31. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

32. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

33. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

34. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

35. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

36. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

37. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

38. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

39. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

40. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

41. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

42. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

43. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

44. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

45. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

46. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

47. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

48. Sedaghaty denies the allegations in this paragraph insofar as they refer to the Al Haramain Islamic Foundation, Inc. (USA) ("AHIF-USA"). Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

49. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

50. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

51. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

52. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

53. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

54. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

55. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

56. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

57. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

58. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

59. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

60. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

61. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

62. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

63. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

64. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

65. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

66. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

67. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

68. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

69. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

70. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

71. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

72. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

73. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

74. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

75. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

76. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

77. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

78. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

79. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

80. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

81. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

82. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

83. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

84. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

85. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

86. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

87. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

88. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

89. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

90. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

91. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

92. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

93. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

94. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

95. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

96. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

97. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

98. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

99. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

100. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

101. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

102. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

103. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

104. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

105. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

106. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

107. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

108. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

109. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

110. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

111. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

112. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

113. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

114. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

115. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

116. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

117. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

118. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

119. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

120. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

121. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

122. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

123. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

124. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

125. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

126. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

127. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

128. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

129. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

130. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

131. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

132. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

133. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

134. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

135. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

136. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

137. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

138. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

139. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

140. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

141. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

142. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

143. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

144. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

145. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

146. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

147. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

148. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

149. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

150. Sedaghaty denies the allegations in paragraph 150 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

151. Sedaghaty denies the allegations in paragraph 151 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

152. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

153. Sedaghaty denies the allegations in paragraph 153 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

154. Sedaghaty denies the allegations in paragraph 154 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other

allegations contained in this paragraph.

155. Sedaghaty denies that AHIF-USA is “controlled primarily from al-Haramain’s headquarters in Riyadh, Saudi Arabia,” or that it has “been exposed for providing direct and material support to al Qaeda.” Sedaghaty admits that the United States government has designated two groups in Bosnia and Somalia affiliated with al-Haramain (Saudi Arabia) as terrorist entities. Sedaghaty denies all other allegations in paragraph 155 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

156. Sedaghaty denies the allegations in paragraph 156 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

157. Sedaghaty admits that AHIF-USA is incorporated and registered to do business in Oregon. Sedaghaty denies the remaining allegations in paragraph 157 insofar as they refer to AHIF-USA, Soliman H.S. al-Buthe, or Perouz Seda Ghaty. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

158. Sedaghaty denies the allegations in paragraph 158 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

159. Sedaghaty denies the allegations in paragraph 159 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

160. Sedaghaty denies the allegations in paragraph 160 insofar as they refer to AHIF-

USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

161. Sedaghaty denies the allegations in paragraph 161 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

162. Sedaghaty denies the allegations in paragraph 162 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

163. Sedaghaty admits that al-Haramain (Saudi Arabia) maintains a website, but denies all allegations in paragraph 163 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

164. Sedaghaty denies the allegations in paragraph 164 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

165. Sedaghaty denies the allegations in paragraph 165 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

166. Sedaghaty denies the allegations in paragraph 166 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

167. Sedaghaty denies the allegations in paragraph 167 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge information to admit or deny all other

allegations contained in this paragraph.

168. Sedaghaty denies the allegations in paragraph 168 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

169. Sedaghaty denies the allegations in paragraph 169 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

170. Sedaghaty denies the allegations in paragraph 170 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

171. Sedaghaty denies the allegations in paragraph 171 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

172. Sedaghaty denies the allegations in paragraph 172 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

173. Sedaghaty denies that AHIF-USA is a business entity of al-Haramain (Saudi Arabia), and avers that “al-Haramain [sic] Foundation” and the “al-Haramain [sic] Islamic Foundation” are assumed business names of AHIF-USA under Oregon law, and denies that they are business entities of al-Haramain (Saudi Arabia). Sedaghaty denies that AHIF-USA, al-Haramain [sic] Foundation, or al-Haramain [sic] Islamic Foundation, are one and the same as al-Haramain’s office in Riyadh, Saudi Arabia. Sedaghaty admits that Aqeel al-Aqeel and Mansour al-Kadi were formerly officers of AHIF-USA. Sedaghaty denies the remaining allegations in

paragraph 173, including that he is specifically linked to al Qaeda operations.

174. Sedaghaty denies that AHIF-USA's Year 2000 Form 990 states that "it operates an Islamic center in Springfield, Missouri;" instead, its Year 2000 Form 990 states that "Prayer houses are located in Ashland, Ore. and Springfield, Mo.," and the Springfield prayer house is operated by a separate group. Sedaghaty denies that the property in Springfield, Missouri is owned by al-Haramain (Saudi Arabia). Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in paragraph 174, to the extent an additional response is required.

175. Sedaghaty denies the allegations in paragraph 175 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

176. Sedaghaty denies the allegations in paragraph 176 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

177. Sedaghaty denies the allegations in paragraph 177 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

178. Sedaghaty denies the allegations in paragraph 178 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

179. Sedaghaty denies the allegations in paragraph 179 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

180. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

181. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

182. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

183. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

184. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

185. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

186. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

187. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

188. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

189. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

190. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

191. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

192. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

193. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

194. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

195. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

196. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

197. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

198. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

199. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

200. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

201. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

202. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

203. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

204. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

205. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

206. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

207. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

208. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

209. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

210. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

211. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

212. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

213. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

214. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

215. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

216. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

217. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

218. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

219. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

220. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

221. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

222. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

223. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

224. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

225. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

226. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

227. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

228. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

229. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

230. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

231. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

232. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

233. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

234. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

235. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

236. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

237. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

238. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

239. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

240. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

241. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

242. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

243. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

244. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

245. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

246. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

247. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

248. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

249. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

250. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

251. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

252. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

253. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

254. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

255. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

256. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

257. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

258. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

259. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

260. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

261. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

262. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

263. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

264. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

265. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

266. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

267. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

268. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

269. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

270. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

271. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

272. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

273. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

274. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

275. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

276. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

277. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

278. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

279. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

280. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

281. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

282. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

283. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

284. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

285. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

286. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

287. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

288. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

289. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

290. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

291. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

292. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

293. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

294. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

295. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

296. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

297. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

298. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

299. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

300. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

301. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

302. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

303. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

304. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

305. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

306. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

307. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

308. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

309. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

310. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

311. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

312. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

313. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

314. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

315. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

316. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

317. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

318. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

319. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

320. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

321. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

322. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

323. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

324. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

325. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

326. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

327. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

328. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

329. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

330. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

331. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

332. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

333. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

334. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

335. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

336. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

337. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

338. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

339. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

340. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

341. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

342. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

343. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

344. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

345. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

346. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

347. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

348. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

349. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

350. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

351. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

352. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

353. Sedaghaty denies the allegations in paragraph 353 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

354. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

355. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

356. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

357. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

358. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

359. Sedaghaty denies the allegations in paragraph 359 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

360. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

361. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

362. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

363. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

364. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

365. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

366. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

367. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

368. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

369. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

370. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

371. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

372. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

373. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

374. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

375. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

376. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

377. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

378. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

379. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

380. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

381. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

382. Sedaghaty denies the allegations in paragraph 382 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

383. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

384. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

385. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

386. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

387. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

388. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

389. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

390. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

391. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

392. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

393. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

394. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

395. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

396. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

397. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

398. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

399. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

400. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

401. Sedaghaty denies the allegations in paragraph 401 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

402. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

403. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

404. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

405. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

406. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

407. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

408. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

409. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

410. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

411. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

412. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

413. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

414. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

415. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

416. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

417. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

418. Sedaghaty denies the allegations in paragraph 418 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

419. Sedaghaty denies the allegations in paragraph 419 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

420. Sedaghaty denies the allegations in paragraph 420 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

421. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

422. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

423. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

424. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

425. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

426. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

427. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

428. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

429. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

430. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

431. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

432. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

433. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

434. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

435. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

436. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

437. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

438. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

439. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

440. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

441. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

442. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

443. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

444. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

445. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

446. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

447. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

448. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

449. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

450. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

451. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

452. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

453. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

454. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

455. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

456. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

457. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

458. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

459. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

460. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

461. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

462. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

463. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

464. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

465. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

466. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

467. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

468. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

469. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

470. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

471. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

472. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

473. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

474. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

475. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

476. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

477. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

478. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

479. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

480. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

481. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

482. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

483. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

484. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

485. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

486. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

487. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

488. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

489. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

490. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

491. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

492. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

493. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

494. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

495. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

496. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

497. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

498. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

499. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

500. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

501. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

502. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

503. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

504. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

505. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

506. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

507. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

508. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

509. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

510. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

511. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

512. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

513. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

514. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

515. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

516. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

517. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

518. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

519. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

520. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

521. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

522. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

523. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

524. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

525. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

526. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

527. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

528. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

529. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

530. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

531. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

532. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

533. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

534. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

535. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

536. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

537. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

538. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

539. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

540. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

541. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

542. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

543. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

544. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

545. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

546. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

547. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

548. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

549. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

550. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

551. Sedaghaty denies the allegations in paragraph 551 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

552. Sedaghaty denies the allegations in paragraph 552 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

553. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

554. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

555. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

556. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

557. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

558. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

559. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

560. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

561. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

562. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

563. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

564. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

565. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

566. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

567. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

568. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

569. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

570. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

571. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

572. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

573. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

574. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

575. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

576. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

577. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

578. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

579. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

580. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

581. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

582. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

583. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

584. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

585. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

586. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

587. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

588. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

589. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

590. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

591. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

592. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

593. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

594. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

595. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

596. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

597. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

598. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

599. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

600. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

601. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

602. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

603. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

604. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

605. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

606. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

607. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

608. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

609. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

610. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

611. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

612. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

613. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

614. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

615. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

616. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

617. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

618. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

619. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

620. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

621. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

622. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

623. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

624. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

625. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

626. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

627. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

628. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

629. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

630. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

631. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in paragraph 631.

632. To the extent that allegations in paragraph 632 refer to AHIF-USA, Sedaghaty denies them. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in paragraph 632.

633. To the extent that allegations in paragraph 633 refer to AHIF-USA, Sedaghaty denies them. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in paragraph 633.

634. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in paragraph 634.

CLAIMS

Count One — Foreign Sovereign Immunities Act

635. Count One only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

636. Count One only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

637. Count One only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

638. Count One only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

639. Count One only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is

required, the allegations are denied.

640. Count One only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Count Two – Torture Victim Protection Act

641. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

642. No response is required to the allegations in this paragraph because the Torture Victim Protection Act cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

643. No response is required to the allegations in this paragraph because the Torture Victim Protection Act cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

644. No response is required to the allegations in this paragraph because the Torture Victim Protection Act cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Two). No response is required to the allegations in this paragraph because the Torture Victim Protection Act cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Two against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Three — Anti-Terrorism Act

645. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

646. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

647. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

648. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

649. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

650. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

651. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

652. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Three). Sedaghaty denies that plaintiffs are entitled to

any of the relief requested in their prayer for relief under Count Three against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Four — Alien Tort Claims Act

653. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

654. No response is required to the allegations in this paragraph because the Alien Tort Claims Act cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

655. No response is required to the allegations in this paragraph because the Alien Tort Claims Act cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

656. No response is required to the allegations in this paragraph because the Alien Tort Claims Act cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

657. No response is required to the allegations in this paragraph because the Alien Tort Claims Act cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Four). No response is required to the allegations in this paragraph because the Alien Tort Claims Act cause of action was dismissed by the Memorandum

Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Four against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Five — Wrongful Death

658. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

659. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

660. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

661. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

662. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

663. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

664. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Five). Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Five against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Six – Negligence

665. Sedaghaty hereby incorporates his responses to the previous allegations as if fully

set forth herein.

666. No response is required to the allegations in this paragraph because the Negligence cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

667. No response is required to the allegations in this paragraph because the Negligence cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Six). No response is required to the allegations in this paragraph because the Negligence cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Six against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Seven — Survival

668. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

669. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

670. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Seven). Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Seven against Sedaghaty, or that

they are entitled to any relief in this action against Sedaghaty.

Count Eight — Negligent and/or Intentional Infliction of Emotional Distress

671. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

672. No response is required to the allegations in this paragraph because the Negligent Infliction of Emotional Distress cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. As to the Intentional Infliction of Emotional Distress cause of action, the allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

673. No response is required to the allegations in this paragraph because the Negligent Infliction of Emotional Distress cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. As to the Intentional Infliction of Emotional Distress cause of action, the allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

674. No response is required to the allegations in this paragraph because the Negligent Infliction of Emotional Distress cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. As to the Intentional Infliction of Emotional Distress cause of action, the allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

675. No response is required to the allegations in this paragraph because the Negligent Infliction of Emotional Distress cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. As to the Intentional Infliction of Emotional Distress cause of action, the allegations of this paragraph constitute a conclusion of law to which

no response is required. To the extent a response is required, the allegations are denied.

676. No response is required to the allegations in this paragraph because the Negligent Infliction of Emotional Distress cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. As to the Intentional Infliction of Emotional Distress cause of action, the allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Eight). No response is required to the allegations in this paragraph because the Negligent Infliction of Emotional Distress cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Eight against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Nine — Conspiracy

677. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

678. No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

679. No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

680. No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

681. No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

682. No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Nine). No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Nine against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Ten — Aiding and Abetting

683. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

684. No response is required to the allegations in this paragraph because the Aiding and Abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of

law to which no response is required. To the extent a response is required, the allegations are denied.

685. No response is required to the allegations in this paragraph because the Aiding and Abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

686. No response is required to the allegations in this paragraph because the Aiding and Abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

687. No response is required to the allegations in this paragraph because the Aiding and Abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

688. No response is required to the allegations in this paragraph because the Aiding and Abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Ten). No response is required to the allegations in this

paragraph because the Aiding and Abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Ten against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Eleven – RICO

689. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

690. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

691. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

692. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

693. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

694. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

695. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

696. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

697. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

698. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Eleven). No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any

of the relief requested in their prayer for relief under Count Eleven against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Twelve – RICO

699. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

700. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

701. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

702. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

703. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

704. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated

September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

705. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

706. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Twelve). No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Twelve against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Thirteen – RICO

707. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

708. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

709. No response is required to the allegations in this paragraph because the RICO

cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

710. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

711. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

712. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

713. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

714. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Thirteen). No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Thirteen against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

Count Fourteen — Punitive Damages

715. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

716. No response is required to the allegations in this paragraph because the Punitive Damages cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

717. No response is required to the allegations in this paragraph because the Punitive Damages cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Fourteen). No response is required to the allegations in this paragraph because the Punitive Damages cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Fourteen against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

**Count Fifteen — Punitive Damages: Agencies and Instrumentalities
of the Foreign State Defendant**

718. Sedaghaty hereby incorporates his responses to the previous allegations as if fully

set forth herein.

719. Count Fifteen only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

720. Count Fifteen only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

721. Count Fifteen only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

722. Count Fifteen only applies to plaintiffs' claims against foreign states; Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Common Issues Requiring Consolidation

723. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Jury Demand

Plaintiffs' statement regarding a jury trial and jury demand contain no allegations to which a response is required.

Each and every allegation in plaintiffs' complaint that has not been specifically admitted is hereby denied.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against Sedaghaty for which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

(Causation)

There is no causal connection between any of Sedaghaty's activities and plaintiffs' injuries.

THIRD AFFIRMATIVE DEFENSE

(Causation)

No act or omission of any agent, servant, or employee of Sedaghaty proximately caused any harm or damage to plaintiffs.

FOURTH AFFIRMATIVE DEFENSE

(Causation)

Sedaghaty's activities were not the proximate cause of any harm or damage to plaintiffs.

FIFTH AFFIRMATIVE DEFENSE

(Scienter)

Plaintiffs fail to adequately allege scienter on Sedaghaty's part.

SIXTH AFFIRMATIVE DEFENSE

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

SEVENTH AFFIRMATIVE DEFENSE

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against Sedaghaty.

EIGHTH AFFIRMATIVE DEFENSE

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against Sedaghaty.

NINTH AFFIRMATIVE DEFENSE

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against Sedaghaty.

TENTH AFFIRMATIVE DEFENSE

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against Sedaghaty.

ELEVENTH AFFIRMATIVE DEFENSE

(Statute of Limitations)

Plaintiffs' claims against Sedaghaty are barred, in whole or in part, by the applicable statute of limitation(s).

TWELFTH AFFIRMATIVE DEFENSE

(Punitive Damages)

Plaintiffs' claims for punitive damages against Sedaghaty are barred because Sedaghaty's activities, as alleged by plaintiffs, were not committed with intent, malice, willful and outrageous conduct aggravated by evil motive, or reckless indifference, and none of Sedaghaty's activities in any way were intended to, or did harm, the plaintiffs in this action.

THIRTEENTH AFFIRMATIVE DEFENSE

(Joint or Several Liability)

Defendant is not liable for plaintiffs' damages based on the doctrines of several liability and/or combined or comparative fault, under N.Y. C.P.L.R. § 1601 *et seq.*

FOURTEENTH AFFIRMATIVE DEFENSE

(No Double Recovery)

Plaintiffs have waived their claims based on the doctrine disallowing double recovery and/or the doctrine of election of remedies.

FIFTEENTH AFFIRMATIVE DEFENSE

(Collateral Source)

Plaintiffs have waived their claims based on the collateral source doctrine.

SIXTEENTH AFFIRMATIVE DEFENSE

(Subrogation)

Plaintiffs have waived their claims based on the doctrine of subrogation and/or the doctrine of equitable subrogation.

SEVENTEENTH AFFIRMATIVE DEFENSE

In response to plaintiffs' claims, Sedaghaty intends to invoke any other defenses, including affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses.

Sedaghaty requests that the Plaintiffs' Third Amended Complaint be dismissed with prejudice as to him, and that the Court award attorney's fees and costs to Sedaghaty in defending against a case with no factual or legal basis against him, and award any other relief that the Court deems just under the circumstances.

Respectfully submitted,

/s/ Lynne Bernabei

Lynne Bernabei D.C. Bar No. 938936
Alan R. Kabat D.C. Bar No. 464258
Bernabei & Wachtel, PLLC
1775 T Street, N.W.
Washington, D.C. 20009
(202) 745-1942

Attorneys for Defendant
Perouz Sedaghaty (D60)

Dated: October 15, 2010

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2010, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 (June 16, 2004).

/s/ Alan R. Kabat

Alan R. Kabat